



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

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IN REPLY REFER TO

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04 AUG 2000

Mr. Steve Scharf
New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Eastern Remedial Action
Room 242
50 Wolf Road
Albany, New York 12233-7010

Re: Draft PRAP Northrop Grumman-Bethpage Facility;
Naval Weapons Industrial Reserve Plant (NWIRP) Bethpage
Grumman-Steel Los Plant 2

Dear Steve:

Thank you for allowing the Navy to review the referenced Draft PRAP. For reasons discussed during the teleconference held on 20 July 2000, between the Navy, Northrop Grumman Corporation (NGC), and NYSDEC, the Navy is recommending that the Draft PRAP be revised to reflect the Navy's requirements to issue its own separate PRAP and Record of Decision (ROD) for groundwater. In addition, the Navy offers the following comments.

The Draft PRAP acknowledges the efficacy of Interim Remedial Measures (IRM) but, in addition, includes requirements for hot-spot treatment near the GM-38 area and additional carbon filtration as a "polishing" system on Bethpage Water District (BWD) potable water supply wells for which primary treatment has been provided.

The Navy's comments regarding the necessity of the "hot-spot" treatment proposed by the NYSDEC are generally consistent with those previously forwarded by ARCADIS Geraghty & Miller (AGM), on behalf of the Northrop Grumman Corporation (NGC) in a letter dated 25 July 2000. The Navy also concurs with Northrop Grumman's position that any decisions regarding the downgradient component of this regional groundwater system would be premature for reasons set forth below.

Ongoing well installation and vertical profiling being conducted by the Navy in and around the GM-38 area has produced new data that has not yet been shared to all parties involved. The Navy feels that proper evaluation of this additional data is warranted as this new data may have significant impacts with regards to offsite remedial decisions.

Additionally, the Navy feels that "carbon polishing" for Bethpage Water District (BWD) Plants 4, 5 and 6 is not necessary, relevant, or appropriate as effective treatment systems, in the form of air stripping towers, are already in place. The language contained in the Draft PRAP suggests that residual levels of VOC-contamination remain even after the extracted groundwater is treated, although these residual levels can not be detected. This type of language does not appear to be appropriate as it suggests to the public that continued risks to human health remain with regards to the potable water supply. To the Navy's knowledge, since the installation of air stripping towers on BWD Plants 4, 5, and 6, no chemicals have been detected in any of the effluents of these wells in excess of the maximum contaminant levels (MCLs), defined as the Federal and New York State drinking water standard. Since exceeding an MCL for potable water is the trigger for regulatory intervention, it would be inappropriate for the PRAP to address any level below the MCLs.

Further, in August 1996, the United States of America executed an agreement with BWD that provided funding for an air stripping treatment system on BWD Plant 5. The amount that was provided represented fixed design and construction costs as well as a one-time payment (discounted to present value over a 30-year period) for the maintenance and long-term operation of the treatment system. This represents a clarification to Comment 2 of the 25 July 2000 letter from AGM that states that continued operation of the treatment system in place on BWD Plant 5 is the responsibility of the Navy. The agreement also stated that the BWD will assume all responsibilities for the effectiveness and efficiency of the treatment system and will not hold the Navy responsible for the failure of the treatment system to achieve the adequate treatment of up to 600 ppb of contaminated influent for which the treatment system was designed. Therefore, it is the Navy's interpretation of the agreement that any additional treatment, beyond that which has already been provided by the Navy-funded system, required to meet water district or health department policies, would be the responsibility of the BWD.

With regards to the Navy's comments on the remainder of the Draft PRAP, the Navy also concurs with those comments provided in the 25 July 2000 letter from AGM including the clarification of Comment 2 previously described.

Based on the above, the Navy is recommending that the administrative approach to the PRAP process be revised by dividing the groundwater remedy into two, separate but integrated Operable Units identified as groundwater that is upgradient of the current IRM treatment system (upgradient) and groundwater that is downgradient of the current IRM treatment system (downgradient). This action would result in two separate PRAPs and RODs for groundwater and two public meetings. The Navy further recommends

that NYSDEC use the data/evaluations made in the existing Groundwater FS, prepared by AGM, to only focus on the upgradient portion of groundwater and revise the PRAP to identify the current IRM system as the final remedy for upgradient groundwater.

The Navy also recommends that the revised PRAP include a requirement to develop and implement an OM&M plan for the upgradient remedy, which would include the drilling/installation of the well network currently being performed by the Navy. This would formalize an element of the remedy that is necessary and currently being performed on a voluntary basis.

It would also be anticipated that the revised PRAP for upgradient groundwater would also include the requirement for the preparation and implementation of a predesign work plan to collect information needed to fill existing downgradient "data gaps" (i.e., existence and extent of low permeability clay layer at approximately 650 ft bls in GM-38 area; delineation of VOC-impacted groundwater in VPB GM-77 and VBP GM-38 areas). The data that is currently being collected and the data that the Navy is proposing to collect in this field investigation would then be used to update the 3-D model developed for the site, and the updated model would be used to evaluate various remedial scenarios for downgradient groundwater. The modeling effort would be used to support a limited, focused feasibility study for an integrated downgradient groundwater remedy. It is anticipated that the focused FS would look at about three alternatives, one of which will be no further action.

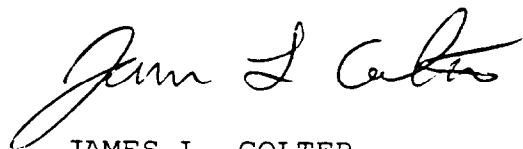
Addressing the groundwater issue in separate components would allow additional time for all parties involved to collect, analyze and evaluate the additional downgradient data as well as the appropriateness of any additional downgradient remedies but would not delay formalizing the generally agreed-to upgradient remedy. At the same time, separation of the groundwater issue would also allow the Navy to complete its Finding of Suitability to Transfer (FOST) determination for the 105-acre portion of the NWIRP Bethpage, thereby allowing for the immediate economic redevelopment of this property by Nassau County. As you know, the Navy has been pursuing the transfer of the NWIRP Bethpage to Nassau County for the past two years while maintaining the vacated facility in a usable condition. The Navy has no further funding to maintain the vacant NWIRP. An equitable solution to the above environmental issues needs to be achieved or the property cannot be transferred. That will result in facility deterioration, and the benefits to be gained by Nassau County from owning property will be lost.

Based on the above, it seems that the proposed Public Meeting date of August 23, 2000 is premature until the issues previously discussed are fully considered and resolved by all involved parties (NYSDEC, NYSDEC Region I, NYSDOH, NGC, and Navy).

The Navy plans to discuss its role with regards to the regional groundwater issue to the community representatives of NWIRP Bethpage's Restoration Advisory Board (RAB) during the next scheduled meeting tentatively set for August 31, 2000. The Navy will discuss the progress that all parties have made to date and will share the comments made by the Navy with regards to the Draft PRAP.

It is the Navy's desire to continue to work cooperatively together with Northrop Grumman and NYSDEC, as demonstrated in the past, so as to agree on an appropriate course of action that will lead to a proper solution regarding the remediation of upgradient and downgradient groundwater but at the same time allows for imminent transfer of the Navy's 105-acres to Nassau County.

Sincerely,

A handwritten signature in dark ink, appearing to read "James L. Colter". The signature is fluid and cursive, with the first name "James" being the most prominent part.

JAMES L. COLTER
Remedial Project Manager
by Direction of the
Commanding Officer

Copy to:
NYSDEC Region I, Ray Cowen
NYSDOH, Bill Gilday
NAVAIR, Joe Kaminski
J.A. Jones, Al Taormina
NGC, Larry Leskovian/John Cofman
AGM, Carlo San Giovanni/Mike Wolfert